

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AMERICAN CIVIL LIBERTIES UNION, CENTER FOR
CONSTITUTIONAL RIGHTS, PHYSICIANS FOR HUMAN
RIGHTS, VETERANS FOR COMMON SENSE, AND
VETERANS FOR PEACE,

Plaintiffs,

v.

DEPARTMENT OF DEFENSE, AND ITS COMPONENTS
DEPARTMENT OF ARMY, DEPARTMENT OF NAVY,
DEPARTMENT OF AIR FORCE, DEFENSE INTELLIGENCE
AGENCY; DEPARTMENT OF HOMELAND SECURITY;
DEPARTMENT OF JUSTICE, AND ITS COMPONENTS
CIVIL RIGHTS DIVISION, CRIMINAL DIVISION, OFFICE
OF INFORMATION AND PRIVACY, OFFICE OF
INTELLIGENCE POLICY AND REVIEW, FEDERAL
BUREAU OF INVESTIGATION; DEPARTMENT OF STATE;
AND CENTRAL INTELLIGENCE AGENCY,

Defendants.

DOCKET NO.: 04-CV-4151 (AKH)

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DECLARATION OF ALICIA L. BANNON

Alicia L. Bannon, pursuant to penalty of perjury under 28 U.S.C. § 1746, does hereby
state the following:

1. I am an attorney with the law firm Gibbons P.C. and counsel to Plaintiffs in the above-
captioned matter. I submit this declaration in support of Plaintiffs' Supplemental Reply
Memorandum of Law in Support of Plaintiffs' Motion for Contempt and Sanctions.

2. Attached to this declaration is a true and correct copy of the following exhibits:

Exhibit 53 January 17, 2008 Transcript of Proceedings, ACLU v. Department of Defense,
04-cv-4151

Exhibit 54 Vaughn Index of Closed OIG Investigation Documents (excerpts)

Exhibit 55 *Former CIA Clandestine Chief in Memoir to Explain Why Interrogation Videos Destroyed*, Reuters, May 5, 2011

Dated: May 6, 2011
Newark, NJ

/ALB/
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